



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

TM:NMA/RN/AL  
F.#2009R00195

271 Cadman Plaza East  
Brooklyn, New York 11201

May 13, 2012

By ECF

Sarita Kedia  
Paul Schechtman  
*Counsel for M. Persico*

Re: United States v. Michael Persico  
Criminal Docket No. 10-147 (S-4) (SLT)

Dear Counsel:

The government writes to respond to your letters of May 1 and May 11, 2012.

Witness Information

First, with regard to your request for witness contact information, the government hereby provides the following information:

1. Anthony Russo. Anthony Russo's attorney is Alex Eisemann, Esq. He can be reached at 914-763-4444.
2. Dino Basciano. Basciano's attorney is Howard Weiswasser, Esq. He can be reached at 212-766-7600.
3. Steven Marcus. Marcus's attorney is Joseph Conway, Esq. He can be reached at 516-248-3520.
4. With regard to Debra Specchio and Jeremy Marcus, their attorney is Edward Mandry, Esq. He can be reached at 516-741-6009.
5. Reynold Maragni. Maragni's attorney is Richard Shanley, Esq. He can be reached at 718-789-2003.
6. Joseph Iborti. Iborti's attorney is Gary Villanueva, Esq. He can be reached at 212-219-0100.

With regard to your request for contact information for Maritza Medina, Ronald Moran, John Paladino and Carmine Sessa, the Federal Bureau of Investigation ("FBI") has contacted each of

these individuals in order to relay counsel's request and has advised that these individuals do not want their contact information to be disclosed to the defendants or their representatives, and they do not wish to speak to them. With regard to your request for contact information for Salvatore Miciotta, Lawrence Mazza, John Pate and Carmine Imbriale, the FBI has advised that it does not have contact information for them. The government notes that none of these witnesses "are in the government's control," contrary to the assertion set forth in the defendant's May 1, 2012 letter.

With regard to your request for contact information for Joseph Ambrosino, the FBI has advised that Mr. Ambrosino is deceased.

#### Section 3500 Material

With regard to your demand for additional Section 3500 material, the government will continue to comply with the previously agreed-upon schedule. As to the defendant's request for an alleged missing page of Steven Marcus's 3500 material, the government will review Marcus's materials and promptly provide any missing information.

#### Transcripts

This week, the government will begin providing transcripts of audio recordings it intends to use at trial. However, the government notes that it has previously provided to the defendant over seventy draft transcripts of the Marcus recordings.

Romantique Search Materials

The government intends to introduce at trial materials recovered pursuant to the court-authorized search of Romantique Limousines.

Sincerely,

LORETTA E. LYNCH  
UNITED STATES ATTORNEY

By:                     /s/                      
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cc: Clerk of Court (SLT) (by ECF)  
Defense Counsel (by ECF)